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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

BRAYDEN STARK, JUDD OOSTYEN,
ISAAC BELENKIY, VALERIE BURTON,
LAURA GOODFIELD, and DENOVIA MACK
on behalf of themselves and all others similarly
situated,

Plaintiffs,

v.

PATREON, INC.,

Defendant.

Case No. 3:22-cv-03131-JCS

**DECLARATION OF SIMON S. GRILLE
IN SUPPORT OF PLAINTIFFS'
ADMINISTRATIVE MOTION TO
CONSIDER WHETHER ANOTHER
PARTY'S MATERIAL SHOULD BE
SEALED**

This Document Relates to:

Stark, et al. v. Meta Platforms, Inc., Case No. 23-
mc-80326-JCS

I, Simon S. Grille, hereby declare under penalty of perjury:

1. I am a partner of the law firm of Girard Sharp LLP and represent Plaintiffs Brayden Stark, Judd Oostyen, Isaac Belenkiy, Valerie Burton, Laura Goodfield, and Denovias Mack (“Plaintiffs”) in this action. I have personal knowledge of the facts stated in this declaration and, if called to do so, could and would testify competently thereto.

2. I submit this declaration in support of Plaintiffs’ Administrative Motion to Consider Whether Another Party’s Material Should Be Sealed.

3. Paragraph 13.3 of the Stipulated Protective Order requires materials designated as “Confidential” (“Protected Material”) to be filed under seal. Protected Material includes information (regardless of how it is generated, stored or maintained) or tangible things that qualify for protection under Federal Rule of Civil Procedure 26(c). Stipulated Protective Order, ¶¶ 2.3, 2.15, *Stark, et al. v. Patreon, Inc.*, Case No. 3:22-cv-03131-JCS (N.D. Cal.), Dkt. No. 29.

4. Portions of the Plaintiffs’ and nonparty Meta’s Joint Discovery Letter and certain exhibits attached thereto contain, summarize or reflect the content of materials Meta has designated as Protected Material pursuant to the Stipulated Protective Order entered in this case or potentially reflect confidential, proprietary, or private information:

Document	Description	Designating Party
Discovery Letter	Plaintiffs’ and Meta’s Joint Letter: Page 1, Lines 12-15, 20-26, 31-39, FN 1; Page 2, Lines 4-11, 14-19, 21-34, 40-47; Page 3, Lines 1-5, 39-41, 45-46; Page 4; Lines 1-2, 4-6, 8-15, 18-23, 26-36, 38-46; Page 5, Lines 1-4, 8-10, 12-17, 20-31	Non-Party Meta
Exhibit A	Plaintiffs’ Excerpts of Deposition Transcript of Amlesh Jayakumar	Non-Party Meta
Exhibit C	Meta’s Excerpts of Deposition Transcript of Amlesh Jayakumar	Non-Party Meta

5. Plaintiffs take no position at this time on whether the designated portions satisfy the requirements for sealing, and specifically reserve the right to challenge any designation under the

1 Stipulated Protective Order as well as the sealability of these documents under Civil Local Rule 79-
2 5.

3 I declare under penalty of perjury that the foregoing is true and correct. Executed this 9th day
4 of April, 2024, in San Francisco, CA.

5 /s/ Simon S. Grille

6 Simon S. Grille

CERTIFICATE OF SERVICE

I hereby certify that on April 9, 2024, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system, which will automatically send notification of the filing to all counsel of record. I also caused a copy of the under-seal documents to be served *via electronic mail* on the following:

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/s/ Simon S. Grille
Simon S. Grille